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June 28, 2000

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Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Room TW-204B
Washington, D.C. 20554

Re: Common Carrier Bureau Asks Parties to Refresh Record and Seeks Additional
Comment on Proposal to Require Resellers to Obtain Carrier Identification Codes
CC Docket No. 94-129

Dear Ms. Salas:

Transmitted herewith on behalf of US Connect LLC ("US Connect") is a copy of its Amended Comment filed with respect to the above-referenced proceeding. US Connect's original Comment was properly filed with the FCC on June 6, 2000.

Please contact me if you have any questions regarding this submission.

Sincerely,



Melanie A. Bootes

MAB/jh

Enclosure

cc: Nancy K. Fears
Paul Markwell
Robert L. Brown
Holland N. McTyre, V

LOU:571213.1

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

Re: Common Carrier Bureau Asks Parties) CC Docket No. 94-129
to Refresh Records and Seeks Additional)
Comment on Proposal to Require)
Resellers to Obtain Carrier Identification)
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**AMENDED COMMENT BY US CONNECT REGARDING FCC'S PROPOSAL
TO REQUIRE RESELLERS TO OBTAIN CARRIER IDENTIFICATION CODES**

US Connect, LLC ("US Connect"), by counsel, files its Amended Comment to the Federal Communications Commission's May 17, 2000, "Common Carrier Bureau Asks Parties to Refresh Record and Seeks Additional Comment on Proposal to Require Resellers to Obtain Carrier Identification Codes." For the reasons set forth below, US Connect requests the FCC to clarify the its policy regarding the reassignment of FGD CIC numbers in the format of "OXXX," as a conflict exists between the FCC's Second Report and Order, 97-125, and CIC Assignment Guidelines (the "Guidelines"), Reissued August 30, 1999 (INC95-0127-006), as interpreted by Neustar, Inc. ("NeuStar"), as the Administrator of the North American Numbering Plan Administration ("NANPA").

On or about December 27, 1999 US Connect placed a valid order for Feature Group D ("FGD") access service with BellSouth Telecommunications, Inc. ("BellSouth") and requested a specific Carrier Identification Code ("CIC"). BellSouth forwarded US Connect's CIC Application to NeuStar, Inc. The specific CIC requested by US Connect is in the format "OXXX."

US Connect's request was consistent with the Guidelines. Section 2.2 of the Guideline states

that “[e]ntity code preference will be handled to the extent possible, and assignments will be made in the order the requests are received.” The Guidelines continue in Sections 4.2 and 4.3 that any CIC returned by a carrier or reclaimed by the Administrator “will be made available for assignment by the NANPA after an idle period of at least six months.” In this case, the specific CIC requested by US Connect was returned to the Administrator and had been inactive for six months prior to US Connect’s request.

On January 10, 2000 NeuStar concluded that the FCC’s Second Report And Order in Case No. 97-115, in particular ¶ 9, stating “that Bellcore should assign only four digit CICs, drawn from the 5XXX to 6XXX range” prevented it from granting US Connect’s request. NeuStar’s analysis should not apply to CICs that have been reclaimed or returned to the Administrator and, at most, should only apply to the issuance of new CICs. NeuStar’s decision is inconsistent with the instructions in the Guidelines because the Guidelines do not specifically prevent the reissuance of returned or reclaimed CICs by the Administrator. Moreover, NeuStar’s decision conflicts with the policy of the Guidelines. The Guidelines state their purposes as follows:

These guidelines have been formulated with consideration of the following two legitimate needs. First, the recognition that the CICs represent a finite resource and should, therefore, be used efficiently and conserved to the extent possible; and second, that their prudent use is inherent in the provision of telecommunications services. Therefore, the guidelines should offer the greatest latitude in the provision of telecommunication services, while maintaining the effective management of a finite resource.

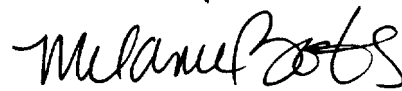
Guidelines, Section 1.1, August 30, 1999.

As well, it should be noted that the FCC has routinely allowed the recycling and reissuance of existing CIC numbers in the context of mergers and acquisitions. Finally, it is the stated policy of the FCC to foster competition in the area of interstate telecommunications. Neustar’s

interpretation of the FCC's Second Report and Order, 97-125, as precluding the reissuance of CICs in the format of "OXXX," thwarts such competition.

Therefore, for the reasons set forth above, US Connect respectfully requests the FCC to clarify that its existing policy does not prohibit the reassignment of reclaimed FGD CIC numbers in the format of "OXXX," as interpreted by Neustar.

Respectfully submitted,



Holland N. McTyeire, V
Robert L. Brown
Melanie A. Bootes

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